

**quinn emanuel trial lawyers | new york**

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7482**

WRITER'S EMAIL ADDRESS  
**juliabeskin@quinnemanuel.com**

April 9, 2019

Hon. Denise L. Cote  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 1910  
New York, NY 10007

Re: ***Gravier Productions, Inc., et al. v. Amazon Content Services, LLC, et al.***, Case No.  
**1:19-cv-01169 (S.D.N.Y.)**

Dear Judge Cote:

We represent Plaintiffs Gravier Productions, Inc. and Woody Allen (collectively, "Plaintiffs") in the above-captioned action against Defendants Amazon Content Services, LLC and Amazon Studios, LLC (collectively, "Defendants"). Pursuant to paragraph 4(C) of this Court's Individual Practices in Civil Cases, we write to explain the basis for Plaintiffs' belief that diversity of citizenship exists in this action.

As alleged in the complaint (Dkt. 1 at 3-4), this Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Plaintiffs and Defendants and the amount in controversy exceeds \$75,000.00,<sup>1</sup> exclusive of interest and costs.

*First*, both Plaintiffs are citizens of the State of New York:

- Gravier Productions, Inc. is a corporation organized and existing under the laws of the State of New York, with its principal place of business in New York, New York.
- Woody Allen is an individual citizen and resident of New York, New York.

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<sup>1</sup> Plaintiffs seek damages in excess of \$68,000,000, plus additional general and special damages to be proven at trial. (Dkt. 1 at 27).

*Second*, both Defendants are citizens of the States of Washington and Delaware, as each Defendant is an LLC whose sole member, Amazon.com, Inc. is a citizen of the States of Washington and Delaware:

- Amazon Content Services, LLC is a limited liability company organized and existing under the laws of the State of Delaware. Amazon Content Services, LLC is a wholly owned subsidiary of non-party Amazon.com, Inc.
- Amazon Studios, LLC is a limited liability company organized and existing under the laws of the State of California. Amazon Studios, LLC is a wholly owned subsidiary of non-party Amazon.com, Inc.
- Amazon.com, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Seattle, Washington. (*See* Dkt. 13, 14).

Dated: April 9, 2019  
New York, New York

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

*/s/ Julia M. Beskin*

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Julia M. Beskin  
juliabeskin@quinnemanuel.com  
Donald J. Reinhard, II  
donaldreinhard@quinnemanuel.com  
51 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10010  
(212) 849-7000 (tel.)  
(212) 849-7100 (fax)

John B. Quinn  
johnquinn@quinnemanuel.com  
Gary E. Gans (*pro hac vice*)  
garygans@quinnemanuel.com  
865 South Figueroa Street, 10<sup>th</sup> Floor  
Los Angeles, California 90017  
(213) 443-3000 (tel.)  
(213) 443-3100 (fax)

*Attorneys for Plaintiffs Gravier Productions, Inc.  
and Woody Allen*